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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 THOMAS A. WUNDERLICH, individually,
11 Plaintiff,

12 vs.

13
14 STATE FARM MUTUAL AUTOMOBILE
15 INSURANCE COMPANY,
16 Defendants.

CASE NO.: 2:21-cv-00486-JAD-EJY

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18 **STIPULATION AND ORDER TO CONTINUE JOINT PRETRIAL ORDER DEADLINE**
19 **(FIRST REQUEST TO EXTEND DEADLINE FOR JOINT PRETRIAL ORDER)**

20 Plaintiff THOMAS A. WUNDERLICH, through his counsel The Cottle Firm, Defendants STATE
21 FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (hereinafter “Defendant”), through their
22 counsel Sean D. Cooney, Esq., of Carmen Cooney, Forbush, PLLC, pursuant to Local Rule IA 6-1 and 26-
23 3 hereby stipulate and agree to a thirty (30) day extension of the deadline to file the Joint Pretrial Order.
24 This is the first request for an extension of the Pretrial Order and is entered in good faith without any intent
25 to delay.
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A. EXTENSION OF DEADLINE TO FILE JOINT PRETRIAL ORDER:

The parties are seeking to extend the deadline to file the Joint Pretrial Order to December 7, 2023.

B. REASON WHY THIS STIPULATION IS NEEDED:

The parties are currently engaging in settlement negotiations and are \$40,000 apart. With a strong possibility of settlement, the parties wish to save the unnecessary expense of preparing a pretrial order.

C. REASON WHY JOINT PRETRIAL ORDER WAS NOT COMPLETED:

The parties are extending the deadline to file the Joint Pretrial Order due to ongoing settlement negotiations. If the parties are unable to resolve this case an extension would allow sufficient time for the parties to meet and confer regarding stipulated exhibits, witnesses and other matters in relation to the trial. The parties submit these reasons constitute good cause under LR 26-3 for the extension.

This Stipulation is made in good faith and not for the purpose of delay.

DATED this 7th day of November, 2023.

THE COTTLE FIRM

CARMAN COONEY FORBUSH PLLC

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: November 7, 2023